

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

JAVIER BELTRAN and §  
ELIZABETH BELTRAN §  
§  
vs. § Civil Action No. 3:16-cv-00057-DB  
§  
PACIFIC SPECIALTY INSURANCE §  
COMPANY §

**DEFENDANT PACIFIC SPECIALTY PROPERTY INSURANCE COMPANY'S**  
**DESIGNATION OF EXPERT WITNESSES**

**TO THE HONORABLE U.S. DISTRICT JUDGE DAVID BRIONES:**

Pursuant to Paragraph 4 of the Court's Scheduling Order (Clerk's Dkt. No. 10),

Defendant Pacific Specialty Property Insurance Company ("PSIC") hereby designates the following expert witnesses who may testify at trial on behalf of PSIC in the above-entitled lawsuit:

**I.**  
**RETAINED TESTIFYING EXPERTS**

- 1. Luis A. Espino, P.E.**  
**EFI Global, Inc.**  
**221 N. Kansas Street, Suite 700**  
**El Paso, Texas 79901**

Mr. Espino is an engineering expert who will provide opinions regarding the cause and extent of any alleged damage to the residence at issue in this lawsuit.

**II.**  
**NON-RETAINED TESTIFYING EXPERTS**

**2. Larry Lumpkin**  
**U.S. Adjusting Services**  
**4090 South Regent**  
**Wichita Falls, Texas 76308**  
**(817) 992-1263**

Larry Lumpkin is an independent adjuster who, prior to this lawsuit, inspected Plaintiffs' residence in order to determine the cause of the alleged loss and the cost to repair the alleged loss.

**3. Fred Ortega**  
**Dependable Roofing**  
**812 Alice Marie Drive**  
**Chaparral, New Mexico 88021**  
**(915) 755-3038**

Fred Ortega is a roofing expert who, prior to this lawsuit, inspected Plaintiffs' residence in order to determine the cause of the alleged loss.

**4. R. Chad Geisler**  
**GERMER BEAMAN & BROWN, PLLC**  
**301 Congress Avenue, Suite 1700**  
**Austin, Texas 78701**

To the extent necessary, R. Chad Geisler will serve as an expert on attorneys' fees and costs.

PSIC certifies that it has also served its expert designations, including all necessary reports, on Plaintiffs' counsel in compliance with the requirements set forth in Federal Rule of Civil Procedure 26(a)(2) and Pursuant to Paragraph 4 of the Court's Scheduling Order (Clerk's Dkt. No. 10).

Respectfully submitted,

**GERMER BEAMAN & BROWN PLLC**  
301 Congress Ave, Suite 1700  
Austin, Texas 78701  
(512) 472-0288  
(512) 472-9280 (Fax)

By: /s/ Ryan Bueche

R. Chad Geisler  
State Bar No. 00793793  
[cgeisler@germer-austin.com](mailto:cgeisler@germer-austin.com)  
Ryan C. Bueche  
[rbueche@germer-austin.com](mailto:rbueche@germer-austin.com)  
State Bar No. 24064970

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby by my signature below that a true and correct copy of the foregoing document was served on all counsel of record in compliance with the Federal Rules of Civil Procedure and the Local Rules for the Western District of Texas on this the 2<sup>nd</sup> day of September, 2016.

Michelle C. Le  
KETTERMAN ROWLAND & WESTLUND  
16500 San Pedro, Ste. 302  
San Antonio, Texas 78232

By: /s/ Ryan Bueche